



U.S. Department of Justice

Criminal Division

***United States Attorney
Central District of California***

*Douglas M. Miller
Assistant United States Attorney
(213) 894-2216*

*1300 United States Courthouse
312 North Spring Street
Los Angeles, CA 90012*

December 23, 2010

Janet Levine
Crowell & Moring LLP
515 South Flower Street
40th Floor
Los Angeles, CA 90071

Re: Lindsey Manufacturing Company

Dear Ms. Levine:

Pursuant to your request for discovery and the court's order, enclosed please find copies of the following documents:

1. One external hard drive containing the following:
 - A. ABB_PRODUCTION_EDOC_REBUILD_TIFFS Concordance database.
Instructions to de-crypt the hard drive and to install the Concordance databases are enclosed in this letter;
 - B. ABB-Oil for Food Concordance database;
 - C. APEX Production Concordance database;
 - D. BASURTO_ESM_PRODUCTION_EDOCS_TIFFS Concordance database;
 - E. BASURTO_PRODUCTION_EMAILS_TIFFS Concordance database;
 - F. Continental Concordance database;
 - G. DOJ_Production Concordance database;
 - H. DOJ_Production_2 Concordance database;
 - I. Ecuador Production Concordance database;

- J. German MOJ Production Concordance database. These documents were previously provided, along with additional documents bates labeled SEC-GMOJ_0000682 through SEC-GMOJ-0001231, in TIFF format.
- K. Grand Jury Materials Concordance database;
- L. Hatzisavvas Production Concordance database;
- M. Hozhabri Production Concordance database;
- N. Independent Consultant Production Concordance database;
- O. Interview Summaries Concordance database;
- P. Merrill Lynch Production Concordance database;
- Q. MX Production Concordance database;
- R. OSISoft Concordance database;
- S. Other DOJ Discovery Concordance database.

2. One DVD containing the following:

- A. Documents produced by ABB Ltd pursuant to a request made by counsel for John Joseph O'Shea, bearing bates labels ABB-0000001 through ABB-00012161. Documents ABB0000001 through ABB00002132 were previously produced, however, the rest of the group was inadvertently not copied. In an abundance of caution, we are reproducing the entire set.
- B. Documents produced by ABB Ltd bearing bates labels ABBNM-V7-001210 through ABBNM-V7-003274. Portions of this volume have not been scanned nor uploaded to the ABB Production Rebuild Concordance database;
- C. Documents produced by ABB Ltd bearing bates labels ABBNM-V30-500807 through ABBNM-V30-507445. Portions of this volume have not been scanned nor uploaded to the ABB Production Rebuild Concordance database;
- D. Documents produced by ABB Ltd bearing bates labels ABBNM-V41-609032 through ABBNM-V41-612468. Portions of this volume have not been scanned nor uploaded to the ABB Production Rebuild Concordance database;
- E. Documents produced by ABB Ltd bearing bates labels ABBNM-V103-1171475 through ABBNM-V103-1172001;
- F. Documents received from GE Money Bank pursuant to a Grand Jury subpoena, bearing bates labels Lindsey_MISC_023031 through Lindsey_MISC_023256;

- G. Documents received from Global Financial Services pursuant to a Grand Jury subpoena, bearing bates labels Lindsey_MISC_023257 through Lindsey_MISC_023453;
- H. Documents received from Wells Fargo Investments pursuant to a Grand Jury subpoena, bearing bates labels Lindsey_WF_008452 through Lindsey_WF_008839;
- I. Documents provided to the Department of Justice from the Securities and Exchange Commission pursuant to the SEC investigation of ABB Ltd, bearing the following bates labels SEC-ABB-LTD-E-0493954 through SEC-ABB-LTD-E-0494972;
- J. Documents provided to the Department of Justice from the Securities and Exchange Commission pursuant to the SEC investigation of ABB Ltd, bearing the following bates labels SWI0000001 through SWI0000061.

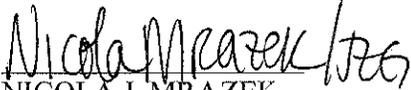
The enclosed materials and any future discovery provided to you which may exceed the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute or relevant case law is provided voluntarily and solely as a matter of discretion. By producing such materials to you, the government does not waive its right to object to any future discovery requests beyond the ambit of its legal obligations.

With this letter the government requests all reciprocal discovery to which it is entitled under Rules 16(b) and 26.2 of the Federal Rules of Criminal Procedure.

Very truly yours,

ANDRÉ BIROTTE JR.
United States Attorney

DOUGLAS M. MILLER
Assistant United States Attorney


NICOLA J. MRÁZEK
Senior Trial Attorney
Fraud Section
Department of Justice, Criminal Division

Enclosures and Attachment